

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JORGE ALEJANDRO ROJAS,

Plaintiff,

vs.

INSURANCE SUPERMARKET INC,

Defendant.

Case No. 1:24-cv-10549

Judge Andrea R. Wood
Magistrate Judge Jeffrey Cole

**DECLARATION OF JORGE ALEJANDRO ROJAS IN OPPOSITION TO
DEFENDANT'S MOTION TO SET ASIDE DEFAULT**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration in support of my opposition to Defendant's Motion to Set Aside Default.
3. On July 12, 2024, I e-mailed Matthew Pitts, which I identified as having previously served as counsel for Defendant. I asked him if he still represented Insurance Supermarket Inc.
4. I emailed a follow up to Matthew Pitts on July 16, 2024.
5. On July 24, 2024, I received a response from Matthew Pitts of which in relevant part stated, "I will ping them tonight and will let you know if I am asked to reach out to you on this."
6. I received no further reply, although I emailed Matthew Pitts again in follow up on July 24 and August 2, 2024.

7. The subject line of my email was to Matthew Pitts was "Rojas v. Insurance Supermarket Inc."
 8. On October 18, 2024 I mailed requests to waive service of the summons to each Defendant, to their registered agent for the corporate entity, and for the individual defendants I mailed them to 1951 Nw 7th Ave Ste 600 Miami, FL 33136.
 9. I did not receive a returned waiver of service.
 10. Tracking records for the waiver package to VANESSA FONSECA, tracking number 9400111206205483618047, indicate delivery on October 22, 2024. Tracking records for the waiver package to ALEXANDER DUDAREV, tracking number 9400111206205483618023, indicate delivery on October 23, 2024.
 11. I mailed copies of filings made in this case, including the motions for entries of default, the extension of time requests for the initial status report, extension of time to serve, notice of voluntary dismissal as to the individuals, and the status report in this case to the 1951 Nw 7th Ave Ste 600 Miami, FL 33136 address as well.
 12. I mailed copies of the motion for default judgment and the notice of motion to 1951 Nw 7th Ave Ste 600 Miami, FL 33136 as well as the registered agent for the corporate entity, USPS 9400111206208857854096, indicating delivery April 24, 2025.
 13. On March 2, 2025, I e-mailed Linn Gillen, who has served as counsel for Defendant in *Escano v. Insurance Supermarket Inc*, 2:23-cv-00793 (D. NM.), asking if she still represented the individual officers. I used a subject line of "1:24-cv-10549 Rojas v. Insurance Supermarket Inc. et al."
 14. I emailed the email with a read receipt, which indicates that the email was opened at least 6 times.
 15. I followed up on the email to Linn Gillen on March 5, 2025, and received no replies.
- Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 9, 2025, in Bolingbrook, IL.



Jorge Alejandro Rojas